

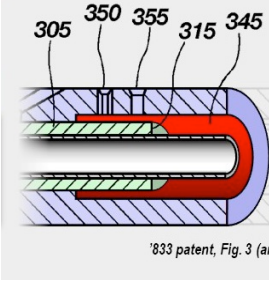
SPECIAL MASTER’S RECOMMENDED CONSTRUCTIONS
PATENT NO.’S 8,215,418, 8,020,635 and 8,881,833

PERSON OF ORDINARY SKILL IN THE ART (POSITA)

A person of ordinary skill in the relevant art would typically minimally include a person having a bachelor’s or master’s degree in petroleum, mechanical, or chemical engineering, with at least two to four years of experience designing and/or operating downhole tools with cutting elements or stabilizers.

Term/Phrase (claims)	Special Master’s Recommendations
<p><i>“[an] actuation member”</i> (‘635 Patent, claim 1)</p> <p>Other claims: ’418 Patent - claims 3, 6, 7, 10, 11, 15, 18 ’635 Patent - claims 2, 6, 11–15, 19</p>	<p>A movable mechanism including, a movable sleeve, linkage or pistons.</p>
<p><i>“a pattern of peaks and valleys”</i> (‘635 Patent, claim 3)</p> <p>Other claims ’418 Patent–claim 12</p>	<p>A series of alternating upwardly sloping and downwardly sloping curved paths.</p>
<p><i>“move axially responsive”</i> (‘833 Patent, claim 14)</p>	<p>Move along the axis defined by the tubular body.</p>
<p><i>“configured to <u>move axially responsive</u> to a flow of drilling fluid through the fluid passageway to extend and retract the one or more expandable features”</i> (‘833 Patent, claim 14)</p>	<p>Configured to move along the axis defined by the tubular body responsive to a flow of drilling fluid through the fluid passageway to extend and retract the one or more expandable features.</p>
<p><i>“traversing at least one pin along a circumferentially extending groove”</i> (‘635 Patent, claim 15)</p>	<p>Plain and ordinary meaning.</p>

<p><i>“selectively and repeatably positionable”</i> (‘635 Patent, claim 1)</p> <p><u>Other claims:</u> ‘635 Patent–claim 19 ‘418 Patent–claim 10</p>	<p>Selectively and repeatably positionable while the tool is in the borehole.</p>
<p><i>“selectively and repeatably moving”</i> (‘635 Patent, claim 11)</p> <p><u>Other claims:</u> ‘635 Patent–claims 12-13, 15 ‘418 Patent–claim 3, 6</p>	<p>Plain and ordinary meaning.</p>
<p><i>“first position”</i> (‘635 Patent, claim 1)</p> <p><u>Other claims:</u> ‘635 Patent - claims 4, 5, 11–15, 19 ‘418 Patent - claims 3, 7, 10, 13, 14, 18</p>	<p>Plain and ordinary meaning.</p>
<p><i>“second position”</i> (‘635 Patent, claim 1)</p> <p><u>Other claims:</u> ‘635 Patent–claims 4, 5, 11–15, 19 ‘418 Patent–claims 3, 7, 10, 13, 14, 18</p>	<p>Plain and ordinary meaning.</p>
<p><i>“third position”</i> (‘635 Patent, claim 2)</p> <p><u>Other claims</u> ‘635 Patent–claims 2, 4, 5, 14 ‘418 Patent–claims 7, 11, 13, 14</p>	<p>Plain and ordinary meaning.</p>
<p><i>“substantially identical”</i> <i>/“substantially the same”</i> (‘635 Patent, claims 1, 11)</p> <p><u>Other claims:</u> ‘635 Patent–claims 7, 8 ‘418 Patent–claims 18-20</p>	<p>Plain and ordinary meaning.</p>

<p><i>“increasing a flow rate of drilling fluid through the expandable reamer to cause at least one blade of the expandable reamer to move from a retracted position to an expanded position”</i> ('418 Patent, claim 1)</p>	<p>Increasing the flow of drilling fluid against the moveable blades such that the blade moves from a retracted position to an expanded position.</p>
<p><i>“lower surface disposed in a lower annular chamber between the push sleeve and the tubular body”</i> ('833 Patent, claim 14)</p>	<p>Plain and ordinary meaning consistent with, for example, annotated Figure 3 illustrating a lower annular chamber 345 (in red), push sleeve 305 (in green), and the tubular body 105 (in purple)*</p>  <p>*The figure should be amended to identify the body 105 directly on the figure.</p>
<p><i>“valve sleeve</i> ('833 Patent, claim 15)</p> <p><u>Other claims:</u> '833 Patent—claim 16</p>	<p>Plain and ordinary meaning.</p>